

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JEFFREY SYNAN

Plaintiff

vs.

CREDIT ACCEPTANCE CORPORATION  
and UNITED TOWING SERVICE, LLC  
Defendants

CIVIL ACTION

NO. 18-cv-1519(MJH)

**PLAINTIFF'S MOTION FOR RECONSIDERATION OF ORDER DISMISSING  
COUNTS IV AND V OF PLAINTIFF'S AMENDED COMPLAINT**

Plaintiff Jeffrey Synan moves this Court to reconsider its December 19, 2018 Order dismissing Counts IV and V of Plaintiff's Amended Complaint. Plaintiff respectfully requests that the Court reinstate those claims—which all parties agreed fell within the scope of the arbitration agreement—because Plaintiff properly moved to stay the litigation pending the arbitration decision. (ECF 12 at p. 2, citing *Lloyd v. HOVENSA, LLC*, 369 F.3d 263, 269 (3d Cir. 2004) (district court lacks discretion to deny any party's request for a stay pending arbitration)). In support, Plaintiff incorporates the accompanying Memorandum.

DATED: December 21, 2018

/s/ Jody Thomas López-Jacobs  
JODY THOMAS LÓPEZ-JACOBS  
Attorney for Plaintiffs

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**CERTIFICATE OF SERVICE**

I hereby certify that on this day, I electronically filed the foregoing document with the Clerk of Court using the ECF system, which will send notification to all counsel of record.

Date: 12/21/18

/s/ Jody T. López-Jacobs  
JODY T. LÓPEZ-JACOBS